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> At this time, we believe we have addressed issues at Outfalls 009 and 010 with the rerouting of the seven sumps in the powerhouse area to the Terminal Lagoon, and away from Outfalls 009 and 010. Nonetheless, we are planning on initiating the study recently submitted, with the U.S.C.G comments incorporated, in order to confirm there are no facility sources of sheen to these Outfalls. At Outfall

001, with the rebuild of the two clarifiers, we have taken the appropriate actions to eliminate visible oil from the Central Treatment Plant. Currently, we are working with United States Steel (USS) to determine any sources of oil that may be present in the cooling water/storm water sewer that discharges directly to Outfall 001 from the Tin Mill. The proposed 001 investigation will enable us to better identify the source/sources of oil at the 001 Outfall structure. Meanwhile, we continue to engage Kenny Manta Industrial Services seven days a week to collect any oil sheen that appears in this structure.

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> As noted in our e-mail of May 9th, to avoid further delay we initiated part of our proposed work plan for Outfall 001 during the week of May 15th. Samples are undergoing analyses as described in the proposed Outfall 001 work plan outline. We expect to report results of that preliminary sampling within the next few weeks. Those results will inform our further work at Outfall 001.

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> Following your advice, we have filed a Freedom of Information Act (FOIA) request to obtain copies of sampling and analytical reports for EPA and Coast Guard samples collected with respect to the Outfall 009 & 010 and Outfall 001 oil sheen issues. We want to also explore possible supplemental analyses of retained extracts for those samples as part of our overall work plans and investigations.

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> To date we have not received any comments from EPA in regards to our Outfall 001 work plan outline. We again extend the offer of a meeting with either, or both Agencies to review our proposed work plan outlines. We value input from EPA and the Coast Guard and we want to ensure the final work plans are responsive to your requests for supplemental investigations as to possible sources of visible oil.

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> We are available Tuesday and Wednesday of next week (May 30 and 31, 2017) to discuss the Coast Guard recommendations, and to discuss any comments EPA may have. At that meeting we will be prepared to address the technical comments from the Coast Guard and review the qualifications of the firms we are using for this work. Please advise if you would like to schedule a meeting. In the event the agencies decide not to participate, we will proceed with developing final work plans based on the USCG comments on the 009/010 outline, and our original 001 outline. We will provide copies of both work plans to EPA and the Coast Guard for review. This effort will take several weeks.

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> Good morning Tom,

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> After that talking with the EPA we would like the following concerns addressed in the workplan:

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> 1. You mention that you will study ArcelorMittal Intake No. 2 (last bullet in 1.0 Section) but you don't mention any sampling at this location in the report. We want you to identify where your heavy fuel oil tanks were located previously (40-50 years ago) and collect adequate number of soil samples (deep enough - likely deeper than 6 inches) in and adjacent to your water intake. Right now, you have no evidence to rule out the fact that these tanks leaked fuel into the sediment and that fuel is now leaching into your water intake. Until you can prove that it is NOT by means of quantitative sampling, you have to still consider it a possible source (especially given the fact that our sampling indicates heavy fuel oil is present and none of their production raw materials contains heavy fuel oils). Please address why did you pick the location of soil samples that you did?

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> 2. Please address that you will use an accredited laboratory for sample analysis. We want to know which lab you intend to use and that they are accredited to analyze EPA Methods.

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> 3. You do mention the company you will be hiring to execute this study but you do not describe their qualifications, credentials, etc. That is, are they qualified to do this type of work? Please address this.

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> 4. Please consider taking soil samples deeper than 6 inches. Why did you chose the depth you came up with for soil samples? (Especially in regards to the old HFO storage area)

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> 5. Please provide a deadline when sampling will be performed and when to expect a report of findings needs to be provided.

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> 6. We would also like to know why the monitoring wells by your intake were installed? Did EPA mandate them or did you do it for some reason? This should be discussed in the report and any data for these wells obtained and presented.

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> 7. How many numbers of samples will be taken and why that number?

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> Very respectfully,

> LT Paul Arnold

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> <042417 AM IH CWTP 001 preliminary work plan outline - EPA.PDF>

> <051117 IH West Outfalls 009 010 draft work plan outline - Coast Guard.pdf>

> <meeting.ics>